

EXHIBIT A



NAILAH K. BYRD
CUYAHOGA COUNTY CLERK OF COURTS
1200 Ontario Street
Cleveland, Ohio 44113

Court of Common Pleas

NOTICE OF
July 1, 2025 16:20

By: JUSTIN E. HERDMAN 0080418

Confirmation Nbr. 3542025

CITY OF CLEVELAND

CV 25 110189

vs.

Judge: LAUREN C. MOORE

HASLAM SPORTS GROUP, LLC, ET AL.

Pages Filed: 3

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO
GENERAL DIVISION

THE CITY OF CLEVELAND,

Plaintiff,

v.

HASLAM SPORTS GROUP, LLC;
CLEVELAND BROWNS FOOTBALL
COMPANY LLC; CLEVELAND BROWNS
STADIUM COMPANY LLC

Defendants.

CASE NO. CV-25-110189

JUDGE LAUREN C. MOORE

Notice of Stay in Federal Court Action

PLAINTIFF CITY OF CLEVELAND'S NOTICE OF
STAY OF FEDERAL COURT ACTION

The City of Cleveland hereby notifies this Court of new developments in *Cleveland Browns Football Company, LLC v. City of Cleveland*, No. 1:24-cv-01857 (N.D. Ohio 2024), the Browns' federal case that purported to challenge the Modell Law's constitutionality.

The City previously notified this Court of its pending motion, filed June 27, 2025, to hold all federal-court deadlines in abeyance until the Browns address how the proposed Haslam Law impacts their third federal complaint. *See* 07/27/2025 Notice of Motion to Hold Federal Court Deadlines In Abeyance. On June 30, 2025, the federal court entered an order on that motion:

Order [non-document] partially granting Defendants' [51] Motion to Hold Deadlines in Abeyance. At this time, the Court declines to order Plaintiffs to address the implications of the pending budget legislation. However, all deadlines are held in abeyance, and this action is stayed until further Order of the Court.

ECF 51, *Cleveland Browns Football Company, LLC v. City of Cleveland*, No. 1:24-cv-01857 (N.D. Ohio June 30, 2024).

To be clear, the federal action—which turns on the constitutionality of the Modell Law—is now stayed indefinitely. If it were not obvious before, it is now: this Ohio action, focused on the Browns’ breach of their lease, is the only way to resolve the claims between these parties and provide the much-needed finality that both parties seek.

Respectfully Submitted,

Dated: July 1, 2025

/s/ Justin E. Herdman

Justin E. Herdman, Bar No. 0080418

jherdman@jonesday.com

Tracy K. Stratford, Bar No. 0069457

tkstratford@jonesday.com

James R. Saywell, Bar No. 0092174

jsaywell@jonesday.com

Samuel V. Lioi, Bar No. 0100464

slioi@jonesday.com

Andrew S. Rumschlag, Bar No. 0102708

arumschlag@jonesday.com

JONES DAY

North Point

901 Lakeside Avenue

Cleveland, OH 44114.1190

Tel: (216) 586-3939

Facsimile: (216) 579-0212

Mark D. Griffin, Bar No. 0064141

MGriffin@clevelandohio.gov

Director of Law

City of Cleveland, Department of Law

601 Lakeside Avenue, Room 106

Cleveland, Ohio 44114-1077

Tel: (216) 664-2800

Attorneys for Plaintiff

The City of Cleveland

CERTIFICATE OF SERVICE

I certify that on July 1, 2025, I electronically filed the foregoing with the Clerk of Court using the electronic filing system, which will send electronic notice of this filing by email to all registered users that have entered an appearance in this case.

Respectfully submitted,

/s/ Justin E. Herdman

Justin E. Herdman

One of the Attorneys for Plaintiff

The City of Cleveland